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*Geoscience and Environmental Management Professionals*

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**ROBERT G.  
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August 19, 1994  
File #965Ms. Loukie Lofchie  
Brunswick Area Citizens for a Safe Environment  
P. O. Box 245  
Brunswick, ME 04011Subject: Review of *Draft Final Long Term Monitoring Plan: Site 9, Neptune Drive Disposal Site*,  
Naval Air Station Brunswick, Brunswick, Maine, August 1994.

Dear Ms. Lofchie:

As requested by the Brunswick Area Citizens for a Safe Environment (BACSE), Robert G. Gerber, Inc. (Gerber), has reviewed the *Draft Final Long Term Monitoring Plan: Site 9, Neptune Drive Disposal Site* for Naval Air Station Brunswick, Brunswick, Maine, dated August 1994. The document was prepared by ABB Environmental Services, Inc., (ABB-ES) for the U. S. Department of the Navy for the Naval Air Station Brunswick (NAS Brunswick) located in Brunswick, Maine. In the subject document, the Navy proposes sampling and reporting activities in support of their proposed interim remedial action to address groundwater contamination at the Neptune Drive Disposal Site.

Site 9, also known as the Neptune Drive Disposal Site, is located in the central portion of NAS Brunswick. The site initially included three areas of potential contamination: the location of a former incinerator and an associated ash disposal area; an area reportedly used for burning and disposal of solvents; and two streams exhibiting iron-staining characteristic of leachate. Results of earlier environmental investigations were reported in the August 1990 *Draft Final Remedial Investigation* (RI) and the April 1991 *Draft Final Supplemental RI* reports prepared by E. C. Jordan. The September 1993 *Draft Technical Memorandum for Site 9* presented a summary of investigations and analysis conducted through 1993, and recommendations for future activities at the site. Several of the issues we raised in our review of the September 1993 and earlier versions of the Technical Memorandum have been broached at subsequent meetings of the Technical Review Committee, and remain outstanding.

We recently reviewed the July 1994 *Proposed Plan for Site 9* that presented the Navy's preferred alternative for an interim remedial action for groundwater at Site 9. The proposed interim action includes groundwater remediation by natural attenuation, implementation of institutional controls to prevent human exposure, and long-term monitoring of groundwater, surface water, and sediments to evaluate changes in environmental quality. We presented our comments on the *Proposed Plan* in our letter to you dated August 10, 1994.

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The subject document addresses the environmental monitoring portion of the proposed remedial alternative. The purpose of the long term monitoring plan, as stated on page 1-3, is to "characterize the groundwater and surface water quality on-site and downgradient of Site 9 and identify contamination, if any, associated with past disposal activities at the site", as well as "better establish the presence/absence and concentrations of contaminants which have been sporadically observed during past sampling events". We provided comments on the June 1994 version of the subject document in our letter to you dated June 29, 1994. Our comments on the current version of the proposed monitoring plan are as follows:

1. Page 1-5. We reiterate our comment from our June 29, 1994, letter concerning the incorporation by reference of significant sections of the *Long Term Monitoring Plan for Site 9*. We still feel that the document should be "freestanding" in that it should include major components, such as the Quality Assurance Project Plan and the Health and Safety Plan (HASP), as appendices rather than reference an earlier document that applies to a completely different location (that is, Sites 1 and 3, Building 95, and the Eastern Plume). It is our understanding, based on an earlier comment by Maine Department of Environmental Protection (DEP) staff, that the document referenced has not yet received agency approval. In addition, the HASP should be a site-specific document relating to the hazards presented to workers at Site 9 as these hazards, and the appropriate actions, are not necessarily the same as those at Sites 1 and 3, Building 95 and the Eastern Plume.
2. Page 1-11. In the June 1994 version of the subject document, the final sentence in the paragraph describing the unnamed streams mentions "leachate seeps and staining" having been observed in both streams. Why is the reference to leachate and staining, as well as the southern unnamed stream, not included in the corresponding sentence in the subject document.
3. Page 1-15. The "area with historic elevated VOCs in groundwater" drawn on Figure 1-4 does not reflect that volatile organic compounds (VOCs) have been detected in CP-902 and MW-908.
4. Page 1-18 - 1-21. The analytical results summarized in Section 1.4.2 do not present "estimated" results (denoted by a "I") consistently. For example, estimated concentrations of vinyl chloride were reported for MW-904, MW-907, and MW-908 in Table 1-1, but are not mentioned in the text on page 1-18. However, estimated concentrations of polynuclear aromatic hydrocarbons (PAHs) are mentioned in the paragraph at the top of page 1-21. The estimated values should be addressed in the text.
5. Page 1-19, 1-21, & 1-24. In several instances, compounds detected are attributed to sampling or laboratory artifacts or laboratory contamination. What do the applicable sampling or laboratory quality control and assurance measures indicate.
6. Page 1-20. What does "normal background range" mean. How is it defined.

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7. Page 1-24. How is "background" defined.

8. Page 1-26. Has it been determined that there is no groundwater input or contribution to samples collected at SW-915.

9. Page 1-26 - 1-30, 2-2. When and how will the contamination in surface water and sediments be evaluated for possible remediation. Levels of PAHs in sediments in particular remain a concern. While additional source investigations are mentioned elsewhere in the text (for example, on page 2-2), it is not clear if these proposed investigations will address surface water and sediment contamination.

10. Page 3-5 & 3-6. Water level measurements should be made at *all* wells at Site 9 during a sampling event even though water quality samples might not be collected from all wells. While the text and Table 3-1 indicate that MW-902 and MW-905 will not be included in the long term monitoring program, the response to DEP's comment #13 (see Appendix B in the subject document) indicates that the two wells will be sampled under another program and if contaminants are detected, they will be added to the long term monitoring program.

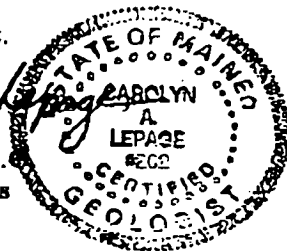
11. Page 3-7. How often will in situ parameters be monitored. What are the stabilization criteria.

12. General Comment. In our June 29, 1994, letter concerning the previous draft of the subject document, we noted there were a number of issues we raised concerning the May 1994 *Draft Proposed Plan for Site 9* that remained unanswered at the time, such as how contaminants detected in stream sediments would be handled. The *Proposed Plan* was revised in July 1994 and made available for public comment until August 10, 1994. The Navy will be providing written responses to all written comments submitted during the public comment period in the "Responsiveness Summary" of the *Record of Decision*. Depending on the nature and extent of the responses to comments, there may still be some concerns and issues remaining regarding the activities proposed for Site 9.

Please do not hesitate to give us a call if you have any questions on the comments above.

Sincerely,  
Robert G. Gerber, Inc.

*Carolyn A. Lepage*  
Carolyn A. Lepage, C.E.  
Director of Operations



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